

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION  
MDL DOCKET NO. 5:20-MD-2947-KDB-DSC**

**IN RE: LOWE’S COMPANIES, INC.  
FAIR LABOR STANDARDS ACT  
(FLSA) AND WAGE AND HOUR  
LITIGATION**

**THIS DOCUMENT APPLIES TO:**  
*All Cases*

**JOINT NOTICE OF SETTLEMENT AND  
REQUEST FOR STAY**

The Named Plaintiffs and Defendants Lowe’s Companies, Inc. and Lowe’s Home Centers, LLC (collectively, “Defendants”) (together, the “Parties”), jointly state as follows:

1. On December 31, 2021, the Parties executed a Memorandum of Understanding to settle the claims of (a) the remaining FLSA Opt-Ins in the *Danford* action; (b) each Named Plaintiff in the 19 state-law class actions; and (c) approximately 189 former Opt-Ins who were dismissed from *Danford* and subsequently initiated individual arbitrations.

2. Case Management Order No. 1, as amended, provides that on January 14, 2022, the Parties will file all *Daubert* motions and the Plaintiffs will file their motion(s) for final certification of the FLSA collective and certification of the putative Rule 23 classes, with responsive briefs due on February 18, 2022, and replies due on April 4, 2022. *See* Nov. 30, 2021 Minute Order.

3. Consistent with the schedule in the Memorandum of Understanding, the Parties anticipate executing the full settlement agreement and filing a motion for Court approval by March 4, 2022, if not earlier.

4. Accordingly, the Parties respectfully request that the Court stay the existing briefing deadlines pending finalization of the settlement.

A draft order is attached hereto for the Court's consideration.

Dated: January 5, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 5, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to all counsel of record.

/s/ David A. Schnitzer